

**IN THE UNITED STATE DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

RACHEL RAMSBOTTOM)	
ALEXIS BOWLING and)	
JENNA HOUSTON)	
)	CIVIL ACTION
)	
Plaintiffs)	No. 3:21-cv-00272
)	
v.)	JURY TRIAL DEMANDED
)	
LORIN ASHTON,)	JUDGE ALETA A. TRAUGER
AMORPHOUS MUSIC, INC.,)	
BASSNECTAR TOURING, INC.,)	
C3 PRESENTS, L.L.C.,)	
CARLOS DONOHUE; ABC)	
CORPORATIONS, ONE THROUGH)	
TEN (said Names Being Fictitious),)	
JOHN DOES, ONE THROUGH TEN)	
(said Names Being Fictitious))	
)	
Defendants.)	

**PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANT CARLOS DONAHUE'S
MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT**

Plaintiffs, Rachel Ramsbottom, Alexis Bowling, and Jenna Houston,¹ hereby submit by and through their counsel, Laffey, Bucci & Kent, LLP, their Response in Opposition to Defendant Carlos Donohue's Motion to Dismiss Plaintiffs' First Amended Complaint, and respectfully move this Honorable Court to deny Defendant's Motion to Dismiss.

The arguments and authorities advanced in support of this Response in Opposition are set forth in the accompanying Memorandum of law.

Respectfully submitted,

¹ Plaintiff Jane Doe #1 has filed a Notice of Voluntary Dismissal of Claims Pursuant to F.R.C.P. 41(a)(1)(a)(i).

MILLER LAW OFFICES

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